

UNITED STATES OF AMERICA
Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:)
) **Docket 99-25**
Creation of a Low Power Radio Service)

ADDITIONAL WRITTEN COMMENTS OF
THE AMHERST ALLIANCE,
MICHIGAN MUSIC IS WORLD CLASS! CAMPAIGN,
THE LPAM NETWORK,
DON SCHELLHARDT, ESQUIRE
AND
NICKOLAUS E. LEGGETT N3NL

The authors of these Additional Written Comments are all well-known in the Low Power Radio movement. Today -- August 19, 2005 -- we have sent to the FCC's Office of the Secretary, via a Federal Express delivery to the Commission's Capitol Heights facility, 14 copies and an original of a Petition For Rulemaking to establish a commercial Low Power *AM* (LPAM) Radio Service. Since a commercial counterpart to the current, totally non-commercial Low Power *FM* (LPFM) Radio Service would enhance broadcast localism, we are using the vehicle of these Additional Written Comments to add the August 19, 2005 LPAM Petition to the public record of FCC Docket 99-25.

We are 3 citizens' advocacy groups (2 of them nationwide, and the other a powerhouse in the Great Lakes Region) and 2 individuals (both of whom co-filed the 1997 Petition For Rulemaking that led to the FCC's first deliberations on Low Power Radio in 1998, and ultimately to the establishment of a Low Power FM Radio Service in 2000).

Each of us has already submitted at least one filing, individual and/or separately, since FCC Docket 99-25 was re-opened.

All of us have also called, on various occasions, for Docketing of a modified version of the LPAM Petition For Rulemaking that was first submitted to the Commission, by Fred Baumgartner, C.P.B.E. of Colorado, during June of 2003. After 2 years of waiting, however, the 5 parties to these Additional Written Comments decided to prepare and file *our own* Petition For Rulemaking. Although our initial intention was simply to develop and submit an improved version of the Baumgartner Petition, we developed over time some fundamentally different approaches which we consider better -- or, at the very least, *simpler to administer and utilize* -- than Mr. Baumgartner's earlier proposal.

We now urge the Commission to act favorably, *and* expeditiously, on this *new* Petition For Rulemaking to establish a commercial Low Power AM Radio Service.

We also hope, and believe, that adding this Petition to the official public record of FCC Docket 99-25 will further enliven the already robust Commission deliberations -- and public participation -- in this Docket.

Respectfully submitted,

Stephanie Loveless

President

THE AMHERST ALLIANCE

And

President

THE MICHIGAN MUSIC IS WORLD CLASS! CAMPAIGN

P.O. Box 20076

Ferndale, Michigan 48220

jamrag@glis.net

URL: www.amherstalliance.net

William C. Walker

President

THE LPAM NETWORK

And

General Manager

WILW RADIO

35 Ayer Street

Lincoln, Maine 04457

lpam@lpam.net

Don Schellhardt, Esquire

Co-Petitioner, FCC Dockets RM-9208, RM-5528 and RM-10330

And

President Emeritus

THE AMHERST ALLIANCE

Liberal Studies Program

Hollins University

P.O. Box 5936

Roanoke, Virginia 24020

pioneerpath@hotmail.com

(415) 637-5780 [Permanent Cell Phone]

(540) 362-3344 [Temporary Landline Phone]

Nickolaus E. Leggett N3NL

Co-Petitioner, FCC Dockets RM-9208, RM-5528 and RM-10330

And

Petitioner, FCC Docket RM-10402

1432 Northgate Square

#2A

Reston, Virginia 20190

(703) 709-0752

Dated: August 19, 2005